

# The ADEPT response to the MHCLG Committee inquiry into high streets and town centres in 2030

## Introduction

The Association of Directors of Environment, Economy, Planning and Transport (ADEPT) represents Place Directors from county, unitary and metropolitan local authorities, along with Local Enterprise Partnerships (LEPs). ADEPT members are at the very heart of maximising sustainable growth in communities throughout the UK.

ADEPT welcomes this opportunity to submit evidence to the High Streets and Town Centres Inquiry, which sets out to “*examine the future role of the high street in contributing to the local economy and the health, cohesion and cultural life of the local community and the challenges faced amid changing demographic, technological and other trends in recent decades*”. ADEPT views this as an opportunity to set out the important role of planning in delivering sustainable and vibrant high streets and town centres. Members of ADEPT work to get the balance between social, economic and environmental objectives, and are at the heart of creating vibrant sustainable places for all.

In responding to this consultation, we are advocating the important role of planning in supporting the role and function of the high street; and its relationship to broader planning issues. ADEPT would point out the recent recommendations of the Raynsford Review (the interim report of which was published in May 2018).

The University of Southampton produced a study in 2014, entitled: High Street Performance and Evolution, the Southampton study reviews what robust evidence is available on the trends impacting high streets and town centres, and provides a guide to how those trends have changed, and will continue to change, those vital commercial and social spaces. The study provides some insights to assist those developing local policies and strategies to sustain the economic health and vitality of town centres and high streets. The study also identifies the most significant gaps in evidence.<sup>1</sup>

Our comments, below, relate to three general themes: 1) defragmenting policy; 2) the economic, demographic, social and technological challenges facing high streets and town centres and how they are likely to develop; and 3) how high streets and town centres are adapting to challenges and planning for the future.

## Defragmenting policy

ADEPT suggests that this Inquiry is a further opportunity to consider the **golden thread that runs through the Government’s major policy positions** such as the National Planning Policy Framework (NPPF), the Industrial Strategy, Circular Economy, Clean Growth Strategy and the 25 Year Environment Plan. The Inquiry is in particular referred to ADEPT’s response to the National Planning Policy Framework.<sup>2</sup>

ADEPT considers that the proposed revisions to policy relating to economic development and town centres as in the proposed NPPF fail to recognise and adequately address the significant challenges that town centres are facing as a result of changing retail shopping patterns and provision. ADEPT

considers that the policy should recognise these significant challenges and be far more positive in its approach in helping town centres to adapt to changing retail patterns and demand in order for centres to retain their vitality and viability. As explained below the increasing flexibility of PD rights may be harming commercial activity. For example, see the research published by the British Council for Offices which has suggested that 13.3 million square feet of London office space could be lost to office-to-residential conversions carried out under permitted development rights.<sup>3</sup>

In another recent study by the RICS has found that “overall, office-to-residential PD has been a fiscal giveaway from the state to private real estate interests, whilst leaving a legacy of a higher quantum of poor quality housing than is seen with schemes governed through full planning permission.”<sup>4</sup>

The ever-increasing introduction of PD rights runs contrary to the aspirations of the NPPF and local Development Plans and is actually harming the appearance and viability of Town centres, while providing in some cases, substandard accommodation. It would be better for the PD rights aspect to be deleted and for appropriate encouragement in national and local policy. It could also be undermining public support for planning as it is increasingly been perceived as a free for all. The recent research by the RICS highlights the damaging impact of PD rights to town centres.<sup>5</sup>

The government’s approach to planning tends to be sectoral or issues based. The focus should be wider than just the metrics of how many houses and how much employment space. The questions that need to be asked are about how people interact with the places they live and work in to create these thriving places – such as proximity to employment opportunities and thriving economies, transport accessibility and connectivity, good local amenities and public services, quality of life<sup>1</sup>. The fragmented approach to different aspects of growth and development is not conducive to delivering sustainable development.

Rather than creating a ‘slow and expensive and uncertain process’, planning is vital to providing clarity and confidence for developers and those intending to make investment decisions that underpin growth: *“Planning is critical to providing clarity and confidence for investments by markets so that they are able to deliver good development. Planning can improve the quantity and quality of land for development, ready land for construction (for example, by treating contaminated land), resolve ownership constraints (where there are many different owners), and bring forward investment by ensuring that the right infrastructure (such as transport and public amenities) are in place. In these and other ways, planning can lower the overall cost of new development, and open-up opportunities for development.”*<sup>2</sup>

ADEPT is of the view that any one objective (i.e. retailing) cannot be pursued without the others or at the expense of the other objectives. Creating balanced sustainable communities needs a range of aspects to be successful. ADEPT would also encourage the Inquiry to consider the importance and relevance of Sustainable Development Goals (SDGs) and the New Urban Agenda.

---

<sup>1</sup> D. Pendlebury, blog on Royal Town Planning Institute website posted 18 June 2015, ‘What critics of planning should understand about solving the housing crisis’, [www.rtpi.org.uk/briefing-room/rtpi-blog/whatcritics-ofplanning-should-understand-about-solving-the-housing-crisis/](http://www.rtpi.org.uk/briefing-room/rtpi-blog/whatcritics-ofplanning-should-understand-about-solving-the-housing-crisis/)

<sup>2</sup> D. Adams, M. O’Sullivan, A. Inch, M. Tait, C. Watkins, and M. Harris, Delivering the Value of Planning, RTPI Research Report no. 15 (August, 2016), p. 1.

### **The economic, demographic, social and technological challenges facing high streets and town centres and how they are likely to develop**

The existing Permitted Development rights regimes do not support Government ambitions for sustainable areas and communities; and only serve to jeopardise the aspirations for viable businesses in thriving high streets and town centres. These existing PD rights regimes are resulting in the closure of businesses which is of significant concern to Local Authorities, who are trying to promote business growth.

The implementation of Permitted Development rights has resulted in changes to areas in terms of loss of retail, community uses and employment that is harmful to the character and vitality of areas. This needs to be properly assessed and controlled through positive plan policies and application determination rather than blanket implementation of Permitted Development rights that could result in harm. There should be policies that encourage the re-use and appropriate redevelopment of redundant employment sites but not a blanket PD for conversion which results in the closure of viable businesses. It would be better to have national and local policies guiding development than the blunt instrument that is PD rights.<sup>6</sup>

### **How high streets and town centres are adapting to meet these challenges, the conditions necessary for sustainability, for example, residential development and related infrastructure, and how local areas are planning for the future**

ADEPT would welcome policies that support high quality communications provided that they respect, and integrate with, the built and natural environment. ADEPT has been undertaking research into SMART place-making. SMART Places are places where increased citizen engagement, insight and intelligence, hard infrastructure, natural capital, social capital and digital technologies make places more liveable, workable, resilient and better able to respond to challenges.

The smartness of a place is not about technology as such, but rather about how well technology is used in an integrated way to help the city function more effectively. That involves better engagement with its customers, and better mechanisms of governance. Becoming smarter allows a city or town to build on existing foundations in order to set a more engaging vision and follow a new and more effective trajectory.

ARUP estimates that the global market for smart urban systems for transport, energy, healthcare, water and waste will amount to around \$400 Billion per annum by 2020.<sup>7</sup> On the basis of the UK's share of OECD tradable services, it conservatively estimates that the UK should aim to secure 10 percent of this global market, worth \$40 Billion per annum.<sup>8</sup>

The opportunities have been recognised by the Department for Business Innovation and Skills:

“On the back of better connectivity and better access to public information, we can manage cities more effectively, anticipate and solve problems more cost effectively, and raise the economic

prospects and the quality of life in every British town and city. In so doing, the UK can strengthen its position as a global hub of expertise at a time when cities throughout the world are seeking innovative solutions to the challenges of urbanization.”<sup>9</sup>

Reducing the need to travel can make a real contribution to tackling urban congestion. The annual cost of congestion in the UK will Rise 63 % by 2030 to £21 Billion.

ADEPT would welcome policies that support high quality communications provided that they respect, and integrate with, the built and natural environment. ADEPT has been undertaking research into SMART place-making. SMART Places are places where increased citizen engagement, insight and intelligence, hard infrastructure, natural capital, social capital and digital technologies make places more liveable, workable, resilient and better able to respond to challenges.

---

<sup>1</sup> <https://thegreatbritishhighstreet.co.uk/pdf/GBHS-HighStreetReport.pdf>

<sup>2</sup>

[https://www.adeptnet.org.uk/sites/default/files/documents/ADEPT%20full%20response\\_MHCLG%20consultation%20on%20changes%20to%20the%20NPPF\\_10%20May%202018.pdf](https://www.adeptnet.org.uk/sites/default/files/documents/ADEPT%20full%20response_MHCLG%20consultation%20on%20changes%20to%20the%20NPPF_10%20May%202018.pdf)

<sup>3</sup> [http://www.bco.org.uk/Research/Publications/Permitted\\_Development\\_Rights.aspx](http://www.bco.org.uk/Research/Publications/Permitted_Development_Rights.aspx)

<sup>4</sup>

[http://www.rics.org/Global/PDR%20Research%20trust%20reports/22790%20RICS%20Assessing%20Impact%20of%20Office-to-Residential%20REPORT-WEB%20\(without%20notice\).pdf](http://www.rics.org/Global/PDR%20Research%20trust%20reports/22790%20RICS%20Assessing%20Impact%20of%20Office-to-Residential%20REPORT-WEB%20(without%20notice).pdf)

<sup>5</sup>

[http://www.rics.org/Global/PDR%20Research%20trust%20reports/22790%20RICS%20Assessing%20Impact%20of%20Office-to-Residential%20REPORT-WEB%20\(without%20notice\).pdf](http://www.rics.org/Global/PDR%20Research%20trust%20reports/22790%20RICS%20Assessing%20Impact%20of%20Office-to-Residential%20REPORT-WEB%20(without%20notice).pdf)

<sup>6</sup>

[http://www.rics.org/Global/PDR%20Research%20trust%20reports/22790%20RICS%20Assessing%20Impact%20of%20Office-to-Residential%20REPORT-WEB%20\(without%20notice\).pdf](http://www.rics.org/Global/PDR%20Research%20trust%20reports/22790%20RICS%20Assessing%20Impact%20of%20Office-to-Residential%20REPORT-WEB%20(without%20notice).pdf)

<sup>7</sup> Department for Business, Innovation and Skills, Research Paper No.136, *The Smart City Market: Opportunities for the UK*, (October 2013).

<sup>8</sup> Department for Business Innovation and Skills, *Smart Cities – Background Paper*, (October 2013), p. 3.

<sup>9</sup> Department for Business Innovation and Skills, *Smart Cities – Background Paper*, (October 2013), p. 3.